

1 K Wave is a Homer based station. So if we were  
2 reaching, you know, just the Homer base and we take  
3 just the Homer numbers into effect K Wave does very --  
4 K Wave does better here than KPEN does, the country  
5 format, because it's a fishing community. So in that  
6 respect the numbers might not change for Homer. But  
7 yet if you get up to Kenai and you have Kenai -- you  
8 have K Wave and KPEN in that market, well KPEN is a  
9 country format, it's an oil patch crowd, it's a more  
10 popular format. So, you know, as to say which  
11 communities it's going to affect and which ones it  
12 wouldn't would be -- would be difficult.

13 Q But you don't market per community, do you? You  
14 market.....

15 A Sometimes. Typically -- typically we try to do the --  
16 the peninsula wide approach, yes.

17 Q Right. I mean you market the central peninsula, the  
18 south peninsula or peninsula wide, don't you?

19 A Yes.

20 Q And you're not going to have the same numbers peninsula  
21 wide or even in the various territories that you have  
22 now if we take away the translators.

23 A That would be true.

24 Q Okay. So -- and your point per share or your point,  
25 whatever the term is.

1 A Cost per point, uh-huh (affirmative).

2 Q Cost per point is based on the total population of  
3 those various areas, is that correct?

4 A Yes ma'am.

5 Q So doesn't it stand to reason that having the  
6 translators increases your cost per point?

7 MR. SOUTHMAYD: Excuse me, I think that's been asked  
8 and answered a couple times.

9 MS. LANCASTER: Well, I'm asking it one more time  
10 because there seems to be some confusion.

11 MR. SOUTHMAYD: Okay, well just don't badger him. I  
12 think he's answered that three times and the answer has  
13 been, well, maybe yes, maybe no. But if you want to go at  
14 it again, okay.

15 MS. LANCASTER: Okay, I'm going at it one more time.

16 MS. LANCASTER RESUMES:

17 A As a general statement I would say yes.

18 Q Okay.

19 A But there are influences within the market that -- you  
20 know, there's always exceptions.

21 Q Corr -- okay, I understand that. Who -- when you say  
22 that market influences, if you go to sell somebody  
23 advertising and they come back and say well my  
24 competitor is selling me this equivalent ad of what  
25 you're trying to do at a less -- at less cost. Does

1           each salesperson have the authority to just on the spot  
2           reduce your normal prices for tho -- for what you're  
3           trying to sell?

4     A     Typically no.

5     Q     All right. How does that work?

6     A     In the in -- in the -- in the -- in Gary's case, I'll  
7           use him as an example because he's the one that I work  
8           most closely with, Gary will come to me and say hey, I  
9           was over at, you know, such and such a client's, I was  
10          over at a client's the other day and -- and they said  
11          that so and so if offering them this. And we'll take a  
12          look at it and see if that's something that we have  
13          pretty much seen. Typically what's being offered isn't  
14          offered to just one. You know, it's -- we see if  
15          repetitively throughout the community. And Gary will  
16          come to me and say this is what's being done or he'll  
17          call me and he'll say, hey, I'm at such and such place  
18          and -- and this was the -- the -- you know, the last  
19          offer that so and so had but they do want to reach  
20          peninsula wide as well, can I offer them the same rate.  
21          That gets real tricky when they're offering four  
22          stations and we only have three, you know, so we  
23          usually have to compensate in some other way.

24     Q     But don't -- I thought that your big advertising theory  
25          is that you're the only group that offers peninsula

1 wide, that you offer a larger area.....

2 A We do.

3 Q .....of service than any other station.

4 A Uh-huh (affirmative).

5 Q So how can -- does it really matter that they have four  
6 stations and you have three if you're covering a larger  
7 area?

8 A Yeah. But you're assuming that -- that one advertising  
9 plan fits everybody's needs and that's not the case.  
10 Everybody that comes through our door has a different  
11 opinion and different idea as to what they need for  
12 their business. And 90 percent of the time it's not a  
13 matter of walking through the door and convincing them  
14 that you're number one, it's a matter of convincing  
15 them that you can do what they're trying to do with the  
16 amount of money or with the budget or with the idea or  
17 with the plan that they have. So, you know, every  
18 sale, it's not like you walk in with a manual and you  
19 sit down and say this is how it works, every time you  
20 walk into a client's place of business there's 1,500  
21 different variables that you're dealing with and it's  
22 not a matter of, you know, one plan fits all.

23 Q I don't mean to imply that and I'm sorry if you think  
24 that I did. But I would think that if you have an  
25 advertiser who wants to reach a large number of people

1           that you would be their first choice because you're the  
2           only station that will reach the large number of people  
3           that they're looking for. Is that a accurate  
4           statement?

5       A     In some cases yes. Again, you know, one size doesn't  
6           fit all. I can give you a classic example is Pizza  
7           Hut. They have a store in Kenai and they have a store  
8           in Kodiak. They do not want to advertise on our radio  
9           station because of the simple fact that they have two  
10          different price points in Kodiak and Kenai and they  
11          don't want the people coming into the Kodiak store  
12          screaming that they want the pizza for \$9.99 that  
13          they're paying \$13.99 for. So in that particular case  
14          that scenario has worked against us because they don't  
15          want what -- you know, people knowing in the different  
16          markets what they're doing. McDonalds we've had the  
17          same problem with, the folks in Kodiak charge more for  
18          their food than what they do in the Kenai Soldotna and  
19          -- and the Homer area. So in that particular case  
20          McDonalds in -- in Kodiak has refused to -- to  
21          advertise.

22       Q     And this is a problem because you're rebroadcasting the  
23           same signal in both markets, is that correct?

24       A     Yeah, essentially yes.

25       Q     So that you are unable to sell to just the smaller

1 market.

2 A That's not necessarily true.

3 Q Okay.

4 A They have -- they have the option of advertising their  
5 own price point in that individual market. We have  
6 several people that are on in Kodiak right now that are  
7 advertising to Kodiak and Kodiak alone. Because they  
8 don't expect somebody to come to them all the way over  
9 from Homer to fly over there to take, you know, part in  
10 -- in whatever services that they are providing at this  
11 point in time.

12 Q Well, if you have the ability to advertise  
13 individually, have a personal, you know, advertising  
14 program in each of the markets then you are an equal  
15 competitor with the other people who are advertising in  
16 those markets, aren't you?

17 A I'm not sure I understand the question.

18 Q Well, I thought I understood what you're saying that  
19 you have problems with national accounts who might not  
20 want one ad, the same ad, to be run in this large  
21 territory which is.....

22 A Correct.

23 Q .....your big selling point is that you cover a large  
24 territory.

25 A Correct.

1 Q Is that correct?

2 A Uh-huh (affirmative).

3 Q But then when I expressed that I understood your  
4 testimony to be that no, you still could individualize  
5 the ads for the two different places that you gave as  
6 your example.

7 A Uh-huh (affirmative).

8 Q Well, if you can do individual ads for those two places  
9 you're still on the same footing as any competitor that  
10 you would have in those areas, aren't you?

11 A If I understand what you're asking, yes. Yeah, we do  
12 have the ability to localize the ads for the different  
13 communities.

14 Q Okay.

15 A If that's the advertiser's desire.

16 Q So you're really not at a disadvantage as opposed to  
17 any of your competitors in either of those communities,  
18 are you?

19 A In what -- in what -- in regards -- I -- I -- I'm not  
20 following you.

21 Q Okay. What was the example that you just used, the  
22 Kodiak and.....

23 A And Seward.

24 Q Seward.

25 A Uh-huh (affirmative).

1 Q You could go in and sell Seward, sell people in Seward  
2 an ad that's just going to run in Seward. Is that  
3 correct?

4 A No.

5 Q All right.

6 A The ad would run peninsula wide but the approach would  
7 be for Seward. You know, for instance here's the Polar  
8 Bear Plunge proposal that we put together and what we  
9 basically do is we put -- the Polar Bear Plunge is a  
10 January event where it's a cancer fund raiser. People  
11 go out and get sponsors and then they go jump in the  
12 bay in January.

13 UNIDENTIFIED MALE: Oh.

14 A Yeah. So basically what we do is we put together a  
15 proposal that -- that promotes the Seward Polar Bear  
16 Plunge. Okay? And different restaurants and different  
17 businesses within the area partner with us in order to  
18 incorporate those ads and we put a package together and  
19 it promotes the event for that community.

20 Q I guess.....

21 A Those ads go peninsula wide, but it's primarily  
22 targeted to bringing people or reaching the people that  
23 are in Seward during that particular function.

24 Q Okay. That's not really analogous to what I'm trying  
25 to ask you though. Because I'm talking about a



1 national ad.

2 A Okay.

3 Q Which you indicated was a disadvantage at times, it's  
4 caused you problems with national ads and I think you  
5 used Pizza Hut and maybe McDonalds as your examples.  
6 Because the prices are different in each area.

7 A Uh-huh (affirmative).

8 Q And you're broadcasting peninsula wide but you -- they  
9 don't want to broadcast peninsula wide because then  
10 these various areas are going to see that their prices  
11 are different.

12 A Uh-huh (affirmative).

13 Q Do you have the ability to solve that problem and just  
14 -- and broadcast either the different prices in the  
15 different areas?

16 A Okay. My example -- the example that I gave you was  
17 not to show you a problem. You had -- I had expressed  
18 that one size does not fit all and I was using that as  
19 an example to show that, you know, just a broad  
20 statement that says this is the way it is isn't how it  
21 is. Basically what I'm trying to show is and what I'm  
22 -- the -- the point that I was trying to make is is  
23 that broad statements in advertising don't work.  
24 Because each time you walk in and you sit down a  
25 different client you have 1,500 different variables to

1 be dealing with. So there are no two sales that are  
2 identical. And so, you know, to say that -- that this  
3 is the problem, that wasn't -- that wasn't -- I wasn't  
4 saying that it was a problem, I was using that as an  
5 example of some of the variables that we have to deal  
6 with. Now some of the variables that you're referring  
7 to are can we come in and -- and create an ad for say  
8 Kodiak that's geared toward just the Kodiak market.  
9 Yes, we can do that. Can we take a national ad and  
10 develop -- and run two ads with different price points  
11 in them, yes we can do that as well. That's not  
12 dictated by us, that's dictated by the client and the  
13 client's needs at the time.

14 Q Okay. So even though your main marketing advantage  
15 would be your widespread territory, the number of  
16 people that you cover, you do have the ability to  
17 individualize ads so that you -- you are -- you can  
18 remain competitive on these national accounts like  
19 we're just talking about.

20 A Yes. In most cases they don't do that. But, yes, we  
21 do have that ability.

22 Q Okay. Do you accept all kinds of ads? Anybody that  
23 calls you up and wants to place an ad on any of your  
24 stations do you automatically accept them?

25 A Within reason.

1 Q What's that mean?

2 A Well, if somebody calls up and they have an adult porn  
3 shop obviously we're not going to go in and do a live  
4 remote. I mean I'm not trying to be facetious, I'm  
5 just saying, you know, we -- we do have some  
6 constraints and some limitations that -- that we've  
7 placed upon ourselves.

8 Q Do you advertise alcoholic beverages?

9 A No.

10 Q Do you advertise night clubs?

11 A No.

12 Q Do you advertise dances?

13 A Yes. And.....

14 Q What ki -- is there any restrictions on the types of  
15 dances that you will advertise?

16 A Well, typically what we do is we do -- we don't do beer  
17 or alcohol ads. And -- but we do lounge ads, if  
18 there's somebody that's going to be appearing in a  
19 lounge we'll say, you know, whoever the group is now  
20 appearing at the lounge at the Lands End, something  
21 along those lines.

22 Q Is there -- what other types of things would you not  
23 accept advertisements from?

24 A We typically don't do Halloween ads. But other than  
25 that -- it's just a matter of -- of individual taste

1           within the ad. I mean you can have a personal --  
2           perfectly respectable product and have the wrong  
3           approach to it and we might choose not to run that ad,  
4           you know, if it's in poor taste.

5       Q     And who makes that decision?

6       A     That would be Dave Becker.

7       Q     Okay.

8       A     For the most part. I try to head most of that off  
9           before we get there. I try to advise the clients  
10          accordingly that, you know, Cheech and Chong blowing a  
11          joint in the background isn't necessarily the best way  
12          to sell their product, you know, or -- that's just an  
13          example, but, you know, those types of things.

14      Q     Well, would it be fair to say that Mr. Becker's  
15          religious beliefs influence the type of ads that his  
16          stations will play?

17      A     No ma'am. No, I wouldn't say that. Because we have  
18          found -- you know, for instance we don't do -- let's  
19          say for instance it's a race ad. There's no need to  
20          mention in the race ad that, you know, there's going to  
21          be beer and alcohol served. So we promote the event  
22          without the beer and alcohol in the ad. And I don't  
23          think in the 12 years that I've been here there have  
24          been two people that have objected to that.

25      Q     But you wouldn't say that the fact that you would not

1 allow the advertiser to mention beer in the ad was  
2 based upon that was against Mr. Becker's religious  
3 beliefs?

4 A Could you rephrase the question? I'm sorry.

5 Q Yeah. I think I had originally asked you if the ads  
6 that you accept were determined in large part by  
7 whether they were acceptable to Mr. Becker's religious  
8 views and you said no and you gave an example of a race  
9 track, you can advertise the race you just wouldn't say  
10 that there was beer. But the fact that you won't say  
11 there was beer, is that due to Mr. Becker's religious  
12 beliefs that you shouldn't drink?

13 A No, that's based upon his policy as to what's  
14 acceptable for ads on the air.

15 Q Okay.

16 A I don't know if that answers the question that you're  
17 asking or not, but that's -- it's been station policy  
18 ever since I've been here.

19 Q Okay. And Mr. Becker made that policy.

20 A Correct.

21 Q Right. Who makes up the jingles that you guys use on  
22 the air?

23 A That's a good question. Some of them have been  
24 purchased by clients and they provide us with the  
25 jingles. Some of them are provided by jingle

1 manufacturers and some of them are produced locally.

2 Q Okay. And how about the -- I want to say the super --  
3 I was told that at one point you had a super station,  
4 it was kind of like your motto. Are you familiar with  
5 that?

6 A That would -- that would have been before my time.

7 Q Okay. What is your current -- do you have a current -  
8 - I don't know the terminology here, a current motto or  
9 when it comes up on a -- an ad for your station, a  
10 phrase that you frequently use?

11 A They change regularly. We have 15 second liners that -  
12 - that we provide them with like, gosh, every three to  
13 four weeks, up to three months we'll provide them with  
14 a list of liners that the air personalities at the  
15 station come up with. They get sent in, they're  
16 produced and then they're shipped back to us to put in  
17 for 15 second liners here and there in between songs.  
18 So.....

19 Q What's the current one?

20 A Beats the heck out of me, I haven't been here in a  
21 month and a half.

22 Q What the one -- the last one you remember?

23 A We used to use catch the wave a lot for K Wave. You're  
24 in KPEN country for KPEN is one that we use frequently.

25

1 Q Do you use any that promote the idea that you cover a  
2 large area?

3 A Well, typically we do from -- any -- any liner -- I  
4 shouldn't say any, but frequently we'll do from Seward  
5 to Seldovia, Kenai to Kodiak, you're in KPEN country.  
6 Or, you know, whatever station that -- for K Wave and  
7 KPEN that would be appropriate because they're both  
8 peninsula wide.

9 Q When they do the liner like K Wave for example, do you  
10 follow that with the frequency?

11 A I believe so.

12 Q How do you do that if you're on a different frequency  
13 on a translator versus the frequency on the main  
14 station?

15 A Well, we have -- our liners -- we go by KPEN FM 102 and  
16 KPEN FM 105. And that falls back -- that even predates  
17 me back to when you had the tuner dial rather than the  
18 digital. And you turn the dial and you get around 102,  
19 and whether it was 101.3, 101.7 or 102.3 you would get  
20 right around 102 and it would tune in. And that's  
21 something that Dave has never really gotten away from.  
22 And then what we do is we do our translator ID's. When  
23 we do our translator ID then we have the tags with  
24 the -- the translator call letters and everything in  
25 those separate from our regular liners.

1 Q For K Wave what's the frequency when you do your  
2 liners, what frequency follows K Wave?

3 A FM 105.

4 Q Is there any other information between you saying K  
5 Wave and you saying the frequency, do you all insert  
6 anything in there?

7 A No, typi -- well, I don't know. I -- I couldn't answer  
8 that. You know, I'm trying to think. That -- I  
9 couldn't answer that, because it changes so frequently.  
10 I just don't pay attention to all of the liners  
11 anymore. I listen to the commercials because that's --  
12 it -- we drive down the road and I get in trouble all  
13 of the time because my wife's telling me, you know,  
14 sssh, I want to listen to this song and then the  
15 commercial comes on and she says what were you going to  
16 say and, sssh, I have to listen to this commercial.

17 (Whispered conversation)

18 Q Let me see, I'm looking back over my things to see if I  
19 have anything else that -- let me go off for about five  
20 -- or a minute or two.

21 THE REPORTER: Off record.

22 (Off record)

23 (On record)

24 THE REPORTER: Back on record.

25 MS. LANCASTER RESUMES:



1 Q Mr. Coval, I just have one question that I can think  
2 of. Is there any type of policy that if an advertiser  
3 advertises with you then they would not advertise on  
4 another -- one of your competitor's stations?

5 A No. I've heard of that being done the reverse way.  
6 Gary Hondel, the account exec that we have working for  
7 us now, told me when he first came on board, he used to  
8 work for KSRM, and he told me of a package that they  
9 had over there, an introductory package to where if you  
10 purchase the package one of the conditions was -- it  
11 was at a special rate, one of the conditions was that  
12 you could not advertise with other radio stations in  
13 the area. But we've never held to that policy.

14 Q Who do you consider your biggest competitors?

15 A In which areas?

16 Q In all of the areas.

17 A We all -- in the Kenai -- Kenai Soldotna area it would  
18 be K -- KSRM and WHQ. In Kodiak KRX -- KRXX and KVOK.

19 Q Okay. So each of the areas -- there are at least two  
20 stations that are competitive with you.

21 A No, Seward -- I don't know what the status of the  
22 Seward station is. It's kind of a been a hit and miss,  
23 on again, off again type deal for him for the last  
24 three or four years. But it's always been that way  
25 ever since I've been here, somebody will be on the air

1           for awhile and then they find other interests and they  
2           kind of fade out for awhile and then they come back.  
3           So -- there's one -- one station over there that's  
4           intermittent, on -- on again, off again.

5       Q     Okay.

6           MR. SHOOK: Jeff, I'm going to take one minute here.

7           MS. SOUTHMAYD: Sure.

8           MS. LANCASTER: One more minute, we're going off.

9           THE REPORTER: Off record.

10          (Off record)

11          (On record)

12          THE REPORTER: Back on record.

13       MS. LANCASTER RESUMES:

14       Q     Mr. Coval, are you aware of any reason that PCI may not  
15           have -- has not built a full power station in Kodiak or  
16           in Seward?

17       A     Well, until this whole thing came up I didn't -- it  
18           wasn't -- it wasn't necessary. You know, we were  
19           serving Kodiak before the Kodiak stations were on the  
20           air to the best of my knowledge. And we did that  
21           through the use of translators because there just  
22           wasn't enough revenue in Kodiak to warrant putting a  
23           full station on. We've operated the translators out  
24           there successfully and had never had a problem with the  
25           renewal of the permits until this whole issue came up

1           when a Petition to Deny was filed and an investigation  
2           was opened.

3       Q     Translators are a lot cheaper to operate, is that  
4           correct?

5       A     I would imagine so, yes.

6       Q     Yeah. Cheaper to maintain?

7       A     I would imagine so.

8       Q     Yeah. Cheaper to construct?

9       A     Yes.

10      Q     Okay. Was there ever any discussion that you  
11           participated in or overheard regarding building full  
12           power stations in either of those markets?

13      A     No. No. But I do know that every time that he applied  
14           for -- every time he, being Mr. Becker, applied for the  
15           necessary permits to open up a translator in an area  
16           the FCC was more than willing to grant any waivers or  
17           do anything else that was needed for him to do that.

18      Q     Are you including all the renewals that you know about  
19           also?

20      A     Well, I'm talking about in the building phase.

21      Q     Oh. In the.....

22      A     I mean the.....

23      Q     .....construction phase?

24      A     During the construction phase anything that he said  
25           that he wanted to do it the FCC looked at it and said

1 great, go ahead. And then after they were all in place  
2 then it comes -- then comes the question as to whether  
3 or not they should be renewed.

4 Q You weren't around back when he was constructing all  
5 these.....

6 A No.

7 Q .....stations were you?

8 A I was -- I was on board when the Seward translator came  
9 on.

10 Q Okay. So your knowledge as to what occurred back in  
11 those days comes from who?

12 A Just station history. I've seen some of the  
13 construction permits and stuff that are still in the  
14 public file.

15 Q Okay. And has Mr. Becker ever made comments to you  
16 that anytime he applied for anything he got it  
17 basically?

18 A Not in -- not in so many words, no. When we applied  
19 for the -- I was here for the Seward paperwork and I  
20 asked him how that was going and he said, well, you  
21 know, the FCC has granted us all the waivers and  
22 everything that we need in order to make it happen.  
23 And I just assumed that that had been the case with  
24 each and every one of the translators because he didn't  
25 seem to have any trouble getting the paperwork and --

1 necessary to -- to bring the Seward translator online.

2 Q When did you first become aware that there was any  
3 problem with any of the translators as far as the FCC  
4 was concerned?

5 A Right after I took over as Sales Manager and -- and  
6 Kodiak went offline.

7 (Whispered conversation)

8 Q When was that?

9 A Approximately six years ago.

10 MS. LANCASTER: I have no further questions.

11 THE REPORTER: Are you ready to go off record?

12 CROSS EXAMINATION

13 BY MR. SOUTHMAYD:

14 Q Terry, hi, this is Jeff Southmayd.

15 A Hi Jeff.

16 Q Wanted to ask you a few things for clarification.

17 A Sure.

18 Q First of all, have -- for the record, and I don't  
19 recall, have you and I ever spoken before?

20 A No sir.

21 Q Okay. Before to -- before this deposition.

22 A No sir.

23 Q Okay. Now as I understand it you work out of the  
24 Soldotna office?

25 A Yes, the Soldotna Kenai office.

1 Q Okay. And that -- and so does Gary Hondel works out of  
2 the Kenai Soldotna office?

3 A That is correct.

4 Q Okay. Okay. And -- now with regard to programming on  
5 the four stations, and I'm referring to K Wave in  
6 Homer, KGTL in Homer, KPEN in Soldotna and K Bay in  
7 Nikiski. Is that -- those are the four full power  
8 stations?

9 A Correct.

10 Q Do they carry -- let's just focus on the three FM.

11 A Okay.

12 Q They carry news on those stations?

13 A Yes.

14 Q Do they carry public service announcements?

15 A Yes sir.

16 Q They carry community bulletin boards?

17 A Yes sir.

18 Q Do they carry news relating to events in Kenai?

19 A Yes.

20 Q And Anchor Point?

21 A Yes.

22 Q Kachemak City?

23 A Yes.

24 Q Okay. Do they carry public service announcements in  
25 your experience in the past relating to Kenai?

1     A     Yes.

2     Q     Anchor Point?

3     A     Yes.

4     Q     Kachemak City?

5     A     Yes.

6     Q     Kodiak?

7     A     Yes.

8     Q     Okay.

9     A     As.....

10    Q     They carry news items regarding Kodiak on the FM?

11    A     When -- yes, if they're newsworthy items.

12    Q     Okay.

13    A     We don't -- we don't focus necessarily so much on the -

14         - you know, the trivial, but fish openings, weather

15         related type stuff. You know, if there's going to be

16         openings or closures or -- or that type of stuff. We

17         don't carry the everyday mundane, you know, Mayor Bob

18         lost his dog today type stuff. But yes, we do carry

19         news for those areas.

20    Q     But while Peninsula can originate programming on these

21         translators, the programmings broadcast on these

22         translators tailored to the local community to some

23         extent?

24    A     I -- I don't know, I -- I -- I don't think I understand

25         the full question Jeff.

- 1 Q Well, for example, K Wave is rebroadcast on a  
2 translator at Kodiak, isn't it?
- 3 A Correct.
- 4 Q On that translator do they -- has K Wave in the past  
5 carried public service announcements relating to things  
6 in Kodiak?
- 7 A Yes, we have, but those public service announcements go  
8 out over the whole broadcast area, not just Kodiak's.
- 9 Q Right. But they're rebroadcast on the translator in  
10 Kodiak.
- 11 A Correct.
- 12 Q Okay. And would that be true of the translators in  
13 Kenai carrying Kenai related programming from time to  
14 time?
- 15 A Yes sir.
- 16 Q And the Anchor Point carrying Anchor Point  
17 programming.....
- 18 A Correct.
- 19 Q .....from time to time?
- 20 A Correct.
- 21 Q And the Kachemak City translator carrying Kachemak City  
22 programming from time to time?
- 23 A Correct.
- 24 Q Okay. Now, you've spoken a couple of times about some  
25 competitor who sells adverti -- by advertising on one



1 station and you get three stations free I think you  
2 said, was that -- is that what you indicated in your  
3 testimony?

4 A Yes sir.

5 Q Who is that?

6 A John Davis with KSRM.

7 Q And what stations does Davis own?

8 A KSRM, KWHQ, K Kiss and KSLD. And that testimony was  
9 received from clients in the field who have told us  
10 that, you know, they're not going to pay what we're  
11 asking per station because they get all four stations  
12 for the same price.

13 Q They've told you personally that?

14 A Correct.

15 Q Okay. Now just so -- KSRM, what is that, is that an AM  
16 or FM?

17 A AM station.

18 Q Okay. KWHQ?

19 A Is an FM station.

20 Q KKIS?

21 A K Kiss is an FM station.

22 Q KSLD?

23 A Is an AM station.

24 Q So this Davis owns two FM's and two AM's. And is that  
25 in that Kenai Soldotna peninsula?